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Welch Foods, Inc. A Cooperative and
The Promotion In Motion Companies, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR DISTRICT OF NEW JERSEY**

LAUREN HALL, on behalf of herself and
others similarly situated,

Plaintiff,

v.

WELCH FOODS, INC., A COOPERATIVE
and THE PROMOTION IN MOTION
COMPANIES, INC.,

Defendants.

Civil Action No. 18-CV-10500-AET(LHG)

**NOTICE OF MOTION FOR *PRO HAC VICE*
ADMISSION OF COUNSEL**

PLEASE TAKE NOTICE that on August 6, 2018, or as soon thereafter as counsel may be heard, defendants Welch Foods, Inc., a cooperative (“Welch’s”) and the Promotion In Motion Companies, Inc., (“PIM”) (collectively, “Defendants”), by and through undersigned counsel, shall move before the Honorable Lois H. Goodman, U.S.M.J., for entry of an Order, pursuant to L.Civ.R. § 101(c) granting admission *pro hac vice* of Daniel S. Silverman, Esq., Matthew M. Gurvitz, Esq., and Elise Gabriel, Esq. on behalf of Defendants. Defendants will rely upon the accompanying Declarations in support of this motion. A proposed form of order is annexed hereto.

PLEASE TAKE FURTHER NOTICE that pursuant to L.Civ.R. § 101.1, a check in the amount of \$150.00, per counsel, payable to the Clerk, U.S.D.C. for the District of New Jersey, will be submitted upon entry of the Order and all other necessary payments will be made.

PLEASE TAKE FURTHER NOTICE that Defendants hereby request oral argument on the within Motion if opposition is filed.

Respectfully submitted,

HERRICK, FEINSTEIN LLP

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A Cooperative and The Promotion In
Motion Companies, Inc.*

By: s/ David R. King
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Dated: June 29, 2018
Newark, New Jersey